## **Commonwealth of Massachusetts**

**D.T.E. 03-60** 

**Respondent:** John Conroy / John White

**Title:** Vice president / Exec. Director

**REQUEST:** Conversent Communications of Massachusetts, LLC, Set #3

**DATED:** November 24, 2003

**ITEM:** Conversent 3-1

Please indicate if Verizon is seeking a finding of non-impairment for dedicated dark fiber transport for the routes specified below. If the answer for any of these routes is yes, please separately identify the three or more entities that you believe have deployed dedicated dark fiber transport along the route to provide service to their retail customers, if applicable, and the two or more competing carriers that you believe have deployed their own fiber and offer such dark fiber at wholesale along the route.

Wire Center 1	Wire Center 1	Wire Center	Wire Center 2
	Name	2	Name
BLRCMAAN	BILLERICA	BURLMABE	BURLINGTON
LWLLMAAP	LOWELL	BLRCMAAN	BILLERICA
MRBOMAMA	MARLBOROUGH	FRMNMAUN	FRAMINGHAM

**REPLY:** 

Based on the information available to it at the time of filing, Verizon MA did not include the routes listed above in its November 14, 2003 filing.

## **Commonwealth of Massachusetts**

**D.T.E. 03-60** 

**Respondent:** John Conroy / John White

**Title:** <u>Vice President / Exec. Director</u>

**REQUEST:** Conversent Communications of Massachusetts, LLC, Set #3

**DATED:** November 24, 2003

**ITEM:** Conversent 3-2 For each of the routes that you have identified in your response to

CONV-VZ 3-1 above, please describe in detail the factual basis for your claim that the three or more carriers that you identified have deployed dedicated dark fiber transport facilities along the route to provide service to their retail customers. Identify each paper, writing or document that you rely on to support your claims. Please attach as a rider to this interrogatory the true copies of all such

documents.

**REPLY:** Not applicable. Please see Verizon MA's response to 3-1.

### **Commonwealth of Massachusetts**

### **D.T.E. 03-60**

**Respondent:** John Conroy / John White

**Title:** Vice president / Exec Director

**REQUEST:** Conversent Communications of Massachusetts, LLC, Set #3

**DATED:** November 24, 2003

**ITEM:** Conversent 3-3 For each of the routes that you have identified in your response to

CONV-VZ 3-2 above, please describe in detail the factual basis for your claim that the two or more carriers that you identified have deployed their own dark fiber and offer it at wholesale along the same route. Identify each paper, writing or document that you rely

on to support your claims. Please attach as a rider to this

interrogatory the true copies of all such documents.

**REPLY:** Not applicable. Please see Verizon MA's response to 3-1 and 3-2.

### **Commonwealth of Massachusetts**

### **D.T.E. 03-60**

**Respondent:** Bruce Meacham

**Title:** Group Manager – Service Costs

**REQUEST:** Conversent Communications of Massachusetts, LLC, Set #3

**DATED:** November 24, 2003

**ITEM:** Conversent 3-4 Has Verizon developed a cost study and supporting testimony for

basic WPTS hot cuts that it is putting forward in this proceeding? If it has, what is the proposed rate for a basic WPTS hot cut and who are the supporting witnesses? If not, when does Verizon intend to file a WPTS hot cut cost model and supporting testimony and in

what docket does it intend to file them?

**REPLY:** Verizon MA plans to file a cost study and supporting testimony for

basic WPTS hot cuts in this proceeding on December 17, 2003, in compliance with the Department's November 24, 2003 Procedural

Order.